



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

LAND, CHEMICALS &
REDEVELOPMENT
DIVISION

October 5, 2021

Mr. Bryan McCampbell
Division Environmental Manager
PCC Structural, Inc.
4600 Southeast Harney Drive
Portland, Oregon 97206

Re: Follow-up Cleanup Expectations and Requirements – July 2021 Fire Line Trenching Incident
TSCA ID No. ORD 00902 7970

Dear Mr. McCampbell:

This letter is a follow-up to the oral and written notification of the discovery of polychlorinated biphenyl (PCB) remediation waste associated with the fire line extension trenching project at PCC Structural, Inc. Large Parts Campus in Portland, Oregon. The U.S. Environmental Protection Agency, Region 10 (EPA) has determined that contaminated soils, and potentially groundwater, identified in part from initial rounds of characterization sampling, will require cleanup pursuant to the Toxic Substances Control Act (TSCA) and implementing regulations at 40 Code of Federal Regulations (C.F.R) § 761.61 as necessary to ensure that the TSCA standard of no unreasonable risk of injury to health or the environment is satisfied. Similarly, the Oregon Department of Environmental Quality (ODEQ) determined that work to address this incident will be required under the ongoing remedial investigation (RI) for ECSI site #274 and state cleanup process described in ODEQ “Hazardous Substance Remedial Action Rules”, Oregon Administrative Rule (OAR) 340-122-0010 through -0140. This letter documents the steps the EPA and ODEQ expect PCC Structural will need to take to ensure satisfaction of the cited regulatory requirements.

Background

On July 15, 2021, the EPA received verbal notification that PCBs with as-found concentrations both above and below 50 mg/kg had been identified in a trench associated with installation of a fire suppression water line (Reference 1). ODEQ was also informed of the incident on July 16, 2021 (Reference 2). It is the EPA’s understanding that this work was done without prior knowledge of PCC Structural environmental group, and that no pre-construction characterization was done to evaluate the potential for PCBs, hazardous materials, hazardous waste or hazardous constituents to be present.

This initial notification, shared with ODEQ, included preliminary analysis of excavated soils managed at a location separate from the trench itself, and limited sampling of soils remaining exposed within the trench (Reference 3). Subsequently, PCC Structural conducted additional trench sidewall and bottom samples to further refine the presence and distribution of PCBs within the trench (Reference 4). While these data are helpful, they neither provide a full definition of the nature and extent of PCB contamination, nor provide sufficient information to conclusively develop a defensible conceptual site model.

Anticipated Work

The Environmental Protection Agency, Region 10 (EPA) has determined that contaminated soils identified in part from initial rounds of characterization samples meet the definition of PCB Remediation Waste, as defined at 40 C.F.R. § 761.3, and therefore require cleanup pursuant to TSCA and implementing regulations at 40 C.F.R § 761.61 as necessary to ensure that the TSCA standard of no unreasonable risk of injury to health or the environment is satisfied. This letter sets forth a proposed two-step work plan, which the EPA and ODEQ expect will be necessary to satisfy applicable cleanup standards under 40 C.F.R. § 761.61 and OAR 340-122-0010 through -0140. The first step will be work necessary to characterize the full nature and extent of PCB contamination associated with the discovery of PCBs in the fire line trench. Most likely, these nature and extent characterization activities will be conducted as a series of phases until the maximum vertical and horizontal contamination has been determined and any identified data gaps filled. Data from this nature and extent characterization must be of sufficient quality and quantity to support development of the second set of work activities, which will generally constitute a cleanup plan.

Nature and Extent Characterization Work Activities

The EPA and ODEQ have discussed specific aspects of the existing characterization work in the trench area and questions related to the source of the elevated concentration of PCBs. Although it is possible impacted backfill was used in this part of the Large Parts Campus, the initial characterization results from the existing trench area do not conclusively support an impacted backfill explanation or conceptual site model. PCB concentrations are highly variable over a limited area with no discernable spatial pattern. There is some evidence that the highest concentrations are located at depth, which may support the notion of a subsurface release, but that is not consistent within all segments of the trench. For this reason, the EPA and ODEQ have identified the following items that will likely require additional information, or that will need to be considered or documented as part of the nature and extent characterization work activities conducted by PCC Structural:

1. Location of current and former utility lines in the vicinity of the trench, including the electrical and sewer lines encountered in Section 4, as well as the roof drain lines, the new fire line, the storm water lines, etc. Should the nature and extent characterization work extend substantially outside the vertical and horizontal extent of the fire line trench, this information must be correspondingly expanded.
2. Location of current and former interior floor drains and exterior drywells, to consider when interpreting future sampling results.
3. Source(s) of the backfill placed within the utility trenches in this area of the facility and the dates of fill placement, if known, and any backfill soil characterization or acceptance criteria that may exist.
4. For characterization purposes:
 - a. A summary of all PCB results in soil and groundwater collected elsewhere at the Large Parts Campus, including data collected as part of the remedial investigation for ODEQ and the previous "Self-Implementing" Cleanup Action work completed pursuant to EPA approvals. This may provide some additional data to consider for bounding the extent of PCB contamination for the forthcoming investigation.

When ODEQ looked at the RI data developed under ODEQ authority and oversight, it appeared no soil samples were previously collected in the area of the campus associated

with the fire line trench, as the RI work was primarily focused on characterizing the historical solvent releases at the facility.

Any information on current and historical storage and use of PCBs and PCB containing products and/or discharge or emissions of PCBs at the facility, including but not limited to relevant information submitted as part of existing PCB cleanups at the site.

- b. Analysis of future soil samples should include total petroleum hydrocarbons (NWTPH-Dx), in addition to PCB Aroclors. This might provide additional information about a source or migration pathways, for instance, a potential for a carrier oil – such as hydraulic or mineral oil. These substances may not have been detected as part of the volatile organic compound/semi-volatile organic compound (VOC/SVOC) analysis performed for the waste determination work recently completed.
- c. It may be appropriate to report PCB data as both Aroclor mixtures and as individual congeners if doing so may assist in distinguishing between multiple sources of contamination that may have become co-mingled.

The EPA and ODEQ recommend basing the end-point criteria for delineating PCBs based on the most conservative of the EPA and ODEQ values presented below, based on levels that were identified for the previous Self-Implementing Cleanup Action at PCC Structural, as well as screening values applicable under ODEQ authority.

Agency	EPA		DEQ		
Cleanup Requirement	Low Occupancy Cleanup Standards	High Occupancy Cleanup Standards	Occupational Screening Criteria	Construction Worker Screening Criteria	Excavation Worker Screening Criteria
No Action	<M25 mg/kg	≤ 1.0 mg/kg	≤ 0.59 mg/kg	≤ 4.9 mg/kg	≤ 140 mg/kg
Institutional Control (i.e., deed restriction)	> 1.0 mg/kg to ≤ 25 mg/kg	N/A	> 0.59 mg/kg to ≤ 5.9 mg/kg	> 4.9 mg/kg to ≤ 49 mg/kg	> 140 mg/kg to ≤ 1,400 mg/kg
Fence and Signs	> 25 mg/kg to ≤ 50 mg/kg ^a	N/A	> 0.59 mg/kg to ≤ 5.9 mg/kg	> 4.9 mg/kg to ≤ 49 mg/kg	> 140 mg/kg to ≤ 1,400 mg/kg
Cap (minimum 6 inches concrete or asphalt)	> 25 mg/kg to ≤ 100 mg/kg ^a	> 1 to ≤ 10	> 0.59 mg/kg to ≤ 5.9 mg/kg	> 4.9 mg/kg to ≤ 49 mg/kg	> 140 mg/kg to ≤ 1,400 mg/kg
Removal	> 100 mg/kg		> 5.9 mg/kg ^b	> 49 mg/kg ^b	> 1,400 mg/kg ^b

Notes:

^a Institutional controls (i.e., deed restrictions) also required with cleanup requirements.

^b Hot spot value, requires treatment to the extent possible.

mg/kg = milligram per kilogram

Indicates lowest cleanup or screening level value, for delineation

Indicates Preliminary ODEQ Hot Spot – Preference for Removal

As the table above demonstrates, the most conservative applicable screening criteria is ≤ 0.59 mg/kg. Therefore, the EPA and ODEQ expect that the characterization of the PCBs at the site should be completed to a level of 0.59 mg/kg to provide data that will adequately support the future risk assessment and completion of the remedial investigation at the site. Neither the EPA nor ODEQ expect that using 50 mg/kg as a decision criterion for evaluating the nature and extent of PCB contamination will provide sufficient characterization data to support future activities. By ensuring characterization work identifies PCBs associated with the most conservative cleanup criteria in the table above, sufficient characterization data will be available regardless of what cleanup level is ultimately selected.

The values in the last row of the table above (corresponding to “Removal”) represent “hot spot” soil concentrations for PCBs for the three ODEQ exposure scenarios relevant to the site. OAR 340-122-0090(4) requires DEQ to select a remedy that treats or excavates soil hot spots to the extent feasible. Therefore, the nature and extent characterization work plan(s) should be structured to be capable of identifying hot spot contamination as well as the average level of contamination. Further, the EPA and ODEQ recommend that PCC Structurals include development of a conceptual site model to help better understand the observed distribution of contaminants and to guide the characterization process.

Characterization work can be conducted without a written approval from the EPA. However, the EPA requests submission of the draft nature and extent characterization report to the EPA for review and comment to ensure that the report provides the necessary supporting data upon which the cleanup plan will be based.

Cleanup Plan Work Activities

Following completion of nature and extent characterization activities, PCC Structurals will need to develop a cleanup plan for consideration by both the EPA and ODEQ. Consistent with the Voluntary Cleanup Program agreement for the site, ODEQ requests the opportunity to comment on the work plan to assure it meets RI data needs for the State. Once developed, the cleanup plan should be provided to the EPA in the form of a request for a cleanup approval.

The EPA recommends PCC Structurals consider developing its cleanup plan based on the requirements of the self-implementing provisions of 40 C.F.R. § 761.61(a). As was done with some of the past cleanups at PCC Structurals, the EPA may authorize elements of the cleanup plan other than prescribed in 40 C.F.R. § 761.61(a) under the authority of 40 C.F.R. § 761.61(c) subject to the requirement that such elements do not pose an unreasonable risk of injury to health or the environment.

In applying the hot spot rule noted above, DEQ considers engineering constraints, but the general intent is to remove and/or treat contamination as opposed to “managing” it onsite (e.g., asphalt cap). If the cleanup cannot feasibly reduce PCB levels in soil to below relevant risk-based concentrations (RBCs), institutional and engineering controls may be necessary to manage the residual risk.

After ODEQ receives PCC Structurals’ final nature and extent characterization report, ODEQ’s Cleanup Program will issue a letter to PCC Structurals that provides additional instructions for the inclusion of the recently collected data and any additional data that will be collected through the EPA’s direction, into the forthcoming risk assessment for the site. ODEQ will describe the expectations for data collection to support future decision making, additional source identification, and to update the conceptual site model (CSM). ODEQ expects this information will overlap with the EPA directive, and can be fulfilled through PCC Structurals’ completion of the work under the EPA directive; however, that

is not a given and PCC Structural's will be expected to conduct work as necessary to fully comply with all applicable requirements under both EPA and ODEQ authorities.

Work Schedule

The EPA and ODEQ propose the following schedule for completing the work activities enumerated above. Both agencies recognize that this schedule will likely require revision as the project progresses, particularly as the nature and extent characterization process is expected to occur through an iterative phased process. All dates are relative to the date of this letter. The EPA and ODEQ welcome on-going informal discussion and sharing of draft documents throughout this process, with the goal of eliminating the need for formal comments and revisions following document submittal.

Submission of the nature and extent characterization work plan	60 day
EPA and ODEQ acceptance of the characterization work plan	75 days
Start of nature and extent characterization field work	90 days
Completion of nature and extent characterization work	150 days
Submission of nature and extent characterization report	195 days
EPA and ODEQ acceptance of the nature and extent characterization report	210 days
Submission of a cleanup plan/TSCA approval application	240 days
EPA and ODEQ approval issuance	270 days

If you have any questions, you may contact Mr. Kevin Parrett at ODEQ at (503) 229-5567 or kevin.parrett@deq.state.or.us, or Ms. Kimberly Ogle at the EPA at (206) 553-0955 or Ogle.Kimberly@epa.gov.

Sincerely,

Kevin Parrett, Manager
NWR Cleanup and Tanks
Oregon Department of Environmental Quality

Kimberly Ogle, Manager
Corrective Action, Permits and PCB Unit
U.S. Environmental Protection Agency, Region
10

cc: Audrey O'Brien
Oregon Department of Environmental Quality

Heidi Nelson
Oregon Department of Environmental Quality

Tyson Terhaar
PCC Structural's, Inc.

References

- 1) Teleconference, Colette Gaona, Landau Associates, to Dave Bartus, EPA Region 10, July 15, 2021.
- 2) Teleconference, Colette Gaona, Landau Associates, to Heidi Nelson, ODEQ Northwest Region Cleanup and Tanks, July 16, 2021.
- 3) E-mail, "PCC LPC - Phone call follow up and additional trench sampling," Colette Gaona, Landau Associates to Audrey O'Brien, ODEQ and Dave Bartus, EPA, dated July 26, 2021.
- 4) E-mail, "PCC LPC Draft Trench Data Transmittal," Colette Gaona, Landau Associates to Heidi Nelson, Jay Collins and Audrey O'Brien, ODEQ and Dave Bartus, EPA, dated August '19,